



MEMORANDUM

TO: Parson's Paper Mill Site File

cc: Athanasios Hatzopoulos, On-Scene Coordinator (OSC), U.S. Environmental Protection Agency (EPA) Region I, Emergency Planning and Response Branch (EPRB)

FROM: *for NK*
Noah Kutsch, Site Leader, Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team III (START)

DATE: 19 November 2009

THRU: Eric Ackerman, Project Leader, START

RE: Preliminary Assessment/Site Investigation (PA/SI) Activities. Parson's Paper Mill, Holyoke, Massachusetts. TDD Number (No.) 01-09-08-0005; Task No. 0577; Document Control (DC) No. R-5697.

INTRODUCTION

On 2 September 2009, U.S. Environmental Protection Agency (EPA) Region I On-Scene Coordinator (OSC) Athanasios Hatzopoulos and Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team III (START) member Noah Kutsch mobilized to the Parson's Paper Mill site (the site) located in Holyoke, Hampden County, Massachusetts. The purpose of the trip was to collect samples for asbestos analysis from the debris and pipe insulation material that had fallen on the site; to determine what type of material is being contained; and to determine whether a removal action is warranted, and if so, whether the response should be classified as an emergency, time-critical, or non-time critical removal action.

SITE DESCRIPTION

The Parsons Paper Mill Site (the site) is located at 84 Sargeant Street in Holyoke, Hampden County, Massachusetts (MA) (see Attachment A, Figure 1) [1]. The 4.61-acre property is listed on Town of Holyoke Tax Assessors' Map number (No.) 018 as Parcel No. 005, Block 01. The geographic coordinates of the approximate center of the property are 42° 11' 53" north latitude and 72° 36' 42" west longitude. The site is bordered by Sargeant Street to the northeast, a commercial property and Jackson Street to the southwest, and the City of Holyoke canal system's First Level Canal and Second Level Canal to the northwest and the southeast, respectively (see Attachment A, Figure 2) [2].



The site is comprised of 4.61 acres and a mill complex, which was partially destroyed by fire in June 2008. The mill is comprised of five interconnected buildings ranging from two to four stories high and formerly occupying approximately 330,642 square feet. Two sections of the mill burned down during the fire. The largest burned section is located along the northwestern property border, adjacent to the First Level Canal and to Sargeant Street; and the other burned section is situated adjacent to the southwest and to the southeast of the larger section. The remaining sections of the building complex were also damaged by the fire and are situated perpendicular (northwest to southeast) to the canal system. Multi-segmented basements and sub-basements are located throughout the burned and unburned mill buildings. In addition, the site is generally covered by asphalt pavement or packed gravel.

The site is in a commercial/industrial/residential area and is currently zoned for "General Industry" uses. However, there are 32 schools, including daycare centers and public/private schools, within a 1-mile radius of the site. The closest daycare center is less than 0.1 miles away, and Holyoke High School is 0.8 miles away. There are also residences located within 500 feet of the property. In addition, the population within a 1-mile radius of the site is 21,876.

The site was first developed in the 1800s and was purchased in 1890 by Parson's Paper Company, which operated it as a paper manufacturing facility until 2005. Parson's Paper Company, Inc., is a subsidiary of National Vulcanized Fiber Company (NVF), which is currently the owner of the site. The site has been inactive since 2005, and NVF and Parsons Paper Company are currently in Chapter 7 Bankruptcy proceedings.

SITE BACKGROUND

From 1987 through 1990, the Massachusetts Department of Environmental Quality Engineering (MADEQE) [now Department of Environmental Protection (MassDEP)] conducted gasoline release investigations during which three groundwater wells and one soil boring were advanced around the former 1,000-gallon underground storage tank (UST) located on site. Samples were collected from all three wells and surface soil around the UST. Low-level volatile organic compounds (VOCs), such as benzene, toluene, ethylbenzene and xylenes, and chlorinated solvents were detected in the groundwater [3].

In July 1998, a secondary gasoline release investigation was conducted around the UST. All three groundwater wells were replaced and sampled, and three subsurface soil samples were collected from the water table. Low levels of VOCs were detected in two of the subsurface soil samples. Trace gasoline-related VOCs were detected in one groundwater well, with trace concentration levels of chlorinated VOCs in two wells. All concentrations were below the clean-up levels [4].

In January 2001, TRC Environmental Corporation (TRC) conducted a polychlorinated biphenyl (PCB) investigation of electrical transformers staged within a fenced area on site. Surface soil samples were collected from soil adjacent to seven of the 80 transformers staged within the fenced area and one transformer staged outside the fenced area. Sample results indicated there were "elevated levels of PCBs" from samples both inside and outside the fenced area.



Parson's Paper Mill Site File

19 November 2009

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In December 2001, a letter was sent from Northeast Utilities System to Holyoke Gas & Electric (HG&E) stating that extractable petroleum hydrocarbons (EPH) and PCBs had been excavated under a Limited Removal Action (LRA). Approximately 9 tons of soil was removed from the transformer staging area and loaded off site to an unknown facility.

On 11 October 2005, Western Mass Environmental (WME) was subcontracted to excavate the stained soil located within the "release area" located on site. Twelve drums were staged on top of black-stained soil with a strong petroleum smell. The contents of the drums were removed, mixed with Speedy-Dri®, and placed on polyethylene sheeting that was used as a base beneath the excavated soil. Approximately 19.17 tons of a gray-black soil was excavated and loaded for disposal. Excavation depths reached 3.5 feet below ground surface (bgs).

In June 2006, a total of 3,735 gallons and 15,490 pounds of oil or hazardous materials (OHM) were removed from the mill building and site by NVF, as required by MassDEP, and properly disposed of or recycled off site. Additional items removed from the mill included oils in tanks and pistons, propane in cylinders, refrigerants in refrigeration units, mercury in fluorescent light bulbs, PCBs in transformers and light ballasts, and other limited amounts of waste found in drums or 5-gallon buckets.

In June 2008, a fire damaged approximately one half of the mill. The rubble from the burned and collapsed portion of the mill, estimated to be a volume of approximately 5,000 cubic yards, currently exists in piles in the northern portion of the property. This burned rubble contains primarily brick, with some amounts of other solid wastes, including wood and metal.

In August 2008, MassDEP and Tighe & Bond (the consultant for the site owner) collected samples from the burned debris located on site. Analysis of samples collected by MassDEP revealed up to 40% friable asbestos, while analysis of samples collected by Tighe & Bond revealed up to 70% friable asbestos.

In March 2009, MassDEP contacted EPA OSC Hatzopoulos for further investigation of the potential threat of release of friable asbestos.

SITE ACTIVITIES

On 2 September 2009, EPA OSC Hatzopoulos and START member Kutsch mobilized to the site to collect bulk asbestos samples from the pipe wrap and rubble material located outside the factory buildings. Site Health and Safety Coordinator (SHSC) Kutsch conducted a tailgate health and safety meeting, and all personnel signed the site-specific health and safety plan (HASP), which was prepared as a separate document entitled, *Weston Solutions, Inc. Region I START Site Health and Safety Plan (HASP) for the Former Parson's Paper Company Site, Holyoke, Massachusetts*. START member Kutsch established a support zone and calibrated the air monitoring instruments, which included a MultiRae Plus unit [lower explosive limit (LEL), oxygen (O₂), carbon monoxide (CO), hydrogen sulfide (H₂S), and volatile organic compound (VOC) detectors], and a Model 19A radiation meter (RAD meter) [6]. Ambient conditions were recorded in the site-specific HASP as follows: PID = 0.0 parts per million (ppm); LEL = 0%; O₂



= 20.9%; CO = 0 ppm; H₂S = 0 ppm; VOC = 0 ppm; and RAD = 8-12 microRoentgens per hour (μR/hr). Air monitoring was conducted for the duration of the sampling. Any levels above background were documented in the site-specific HASP.

EPA and START conducted a reconnaissance of the entire site. The buildings to the northwest and northeast were heavily damaged from the fire. Large amounts of brick, metal machines, water tanks, metal piping, and ash were observed where the former buildings were located. The central building was also damaged by the fire, but the roof was still standing. Suspected ACM was observed on piping, but due to poor structural integrity, neither EPA nor START entered the building. Adjacent to the central building was a smaller building with no roof. Large tanks labeled "propane" were staged next to the central building, and suspected ACM was observed on piping. The southwest building was not damaged by the fire, and EPA and START entered the building to look for suspected ACM. Visible drums were located throughout the building, with most of the drums containing no product or material. No readings above background were noted on the air monitoring instruments. Suspected ACM was observed on piping throughout the building.

START member Kutsch collected 10 suspected ACM samples (ACM-01 through ACM-10) from locations selected by OSC Hatzopoulos (see Attachment B, Table 1) [7]. START sampling activities were performed in accordance with the site sampling and analysis plan (SAP), which was prepared as a separate document, entitled *Sampling and Analysis Plan for the Former Parson's Paper Company Site, Holyoke, Massachusetts*.

START personnel photodocumented site conditions during sampling activities (see Appendix C, Photodocumentation Log). All samples were sent to EPA Office of Environmental Measurement and Evaluation (OEME), located in North Chelmsford, Massachusetts, for asbestos analyses (see Attachment D, Chain-of-Custody Record).

On 10 September 2009, MassDEP formally requested that EPA conduct a removal action based on the observations and analytical results of the investigations.

On 7 October 2009, START received the analytical data results from OEME [8]. These data are summarized in Attachment B (see Attachment B, Table 2). Complete analytical results are presented in Attachment E (see Attachment E, Analytical Data), as well as in the Parson's Paper Mill Site File.

ANALYTICAL DATA SUMMARIES

Ten samples, including one duplicate sample, were collected from the site and prepared and analyzed for asbestos. Chrysotile was detected at the following concentrations: 2% in ACM-06; 1% in ACM-07; and 5% in ACM-10. In addition, amosite was detected at 12% in ACM-06; and 5% in ACM-10 (see Attachment B, Table 2).



REFERENCES

- [1] USGS (U.S. Geological Survey). 1979. Mt Tom and Springfield North, Massachusetts. (7.5-minute series topographic map).
- [2] Massachusetts Geographic Information Systems (MassGIS). 2005. 1:5,000 Color Digital Orthophoto Imagery, RE: Image No. 109882. Accessed 7 October 2009.
- [3] Tighe & Bond. January 2006. *Release Abatement Measure (RAM) Completions Report and Response Action Outcome (RAO) Statement*. 84 Sargeant Street Holyoke, MA. RTN 1-15498.
- [4] Tighe & Bond. June 2006. *Immediate Response Action Outcome Completion Report and Response Action Statement*. 84 Sargeant Street Holyoke, MA. RTN 1-15546.
- [5] ProScience Analytical Services. 17 August 2008. PLM Asbestos Chain of Custody Record. Project Site & Number: Burned Out Mill: Sergeant & Race Streets, Holyoke.
- [6] Weston Solutions, Inc. July 2005. *Standard Operating Procedure for Ludlum Model 19 MicroR Meter*, SOP No. WSI/S3-027, Superfund Technical Assessment and Response Team III (START), Wilmington, MA.
- [7] Weston Solutions, Inc. July 2005. *Standard Operating Procedure for Waste Pile Sampling*, SOP No. WSI/S3-010, Superfund Technical Assessment and Response Team III (START), Wilmington, MA.
- [8] U.S. Environmental Protection Agency. 11 September 2009. Office of Environmental Measurement and Evaluation. Laboratory Report. Project No. 09090008. [Parsons Papermill, Holyoke, MA – Bulk Asbestos Analysis by PLM].

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Attachments

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Attachment A

Figures

Figure 1 - Site Location Map

Figure 2 - Site Diagram

Figure 3 - Sample Location Diagram

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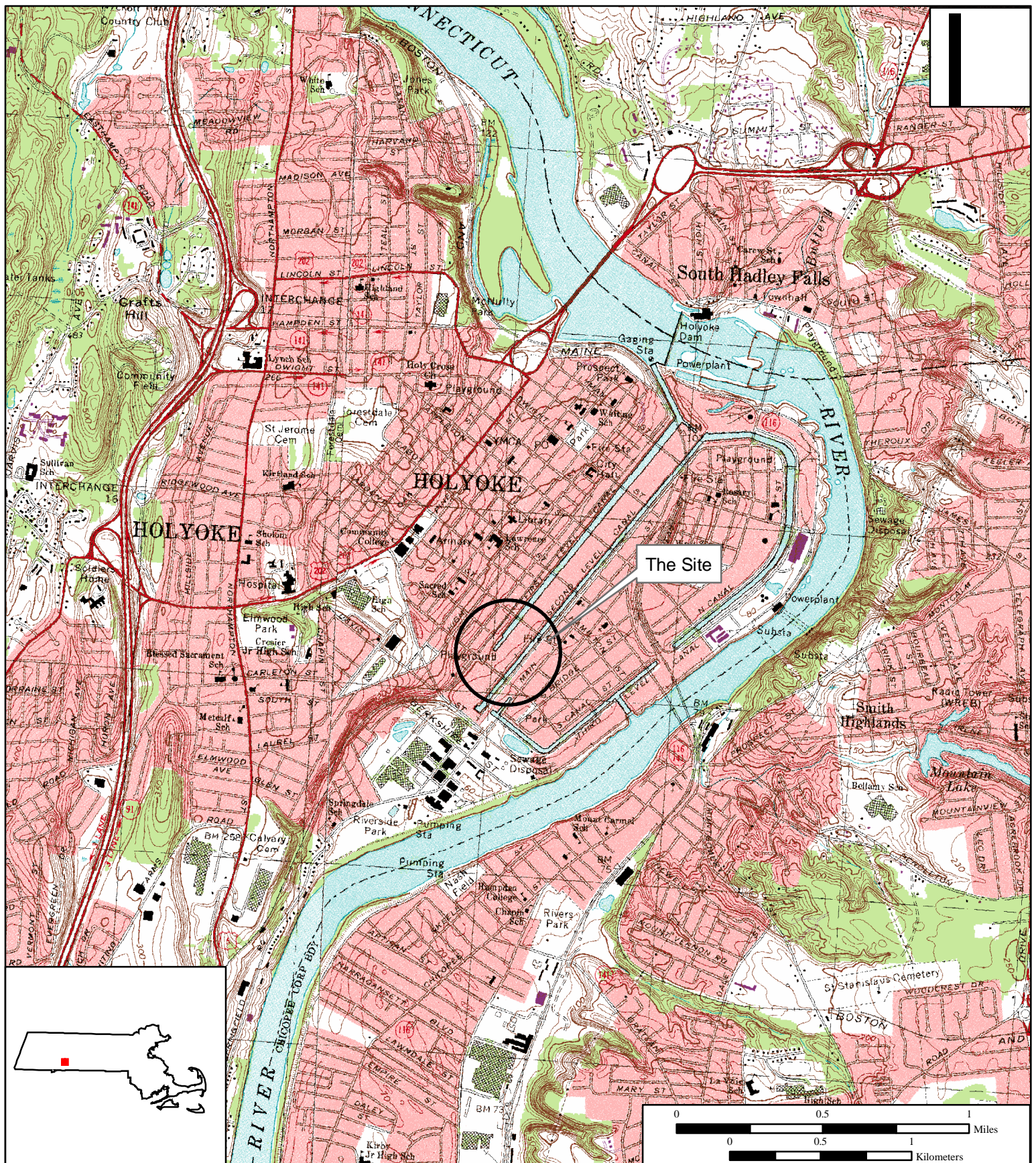


Figure 1

Site Location Map

**Parson's Paper Mill
84 Sargeant Street
Holyoke, Massachusetts**

**EPA Region I
Superfund Technical Assessment and
Response Team (START) III
Contract No. EP-W-05-042**

TDD Number: 09-08-0005
Created by: Noah Kutsch
Created on: 2 September 2009
Modified by: Bonnie Mace
Modified on: 7 October 2009

Data Sources:

Topos: MicroPath/USGS
Quadrangle Name(s): Springfield North, MA. 1981.
All other data: START

WESTON
SOLUTIONS
Restoring Resource Efficiency

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Figure 2

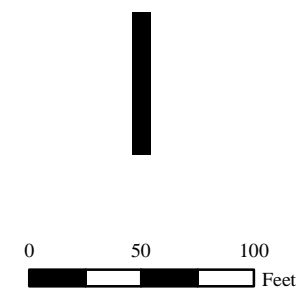
Site Diagram

**Parson's Paper Mill
84 Sargeant Street
Holyoke, Massachusetts**

**EPA Region I
Superfund Technical Assessment and
Response Team (START) III
Contract No. EP-W-05-042**
TDD Number: 09-08-0005
Created by: Bonnie Mace
Created on: 7 October 2009
Modified by:
Modified on:

LEGEND

 Site Boundary



Data Sources:

Imagery: Massachusetts Geographic
Information System (MassGIS), Image No.
109882
Topos: MicroPath
All other data: START



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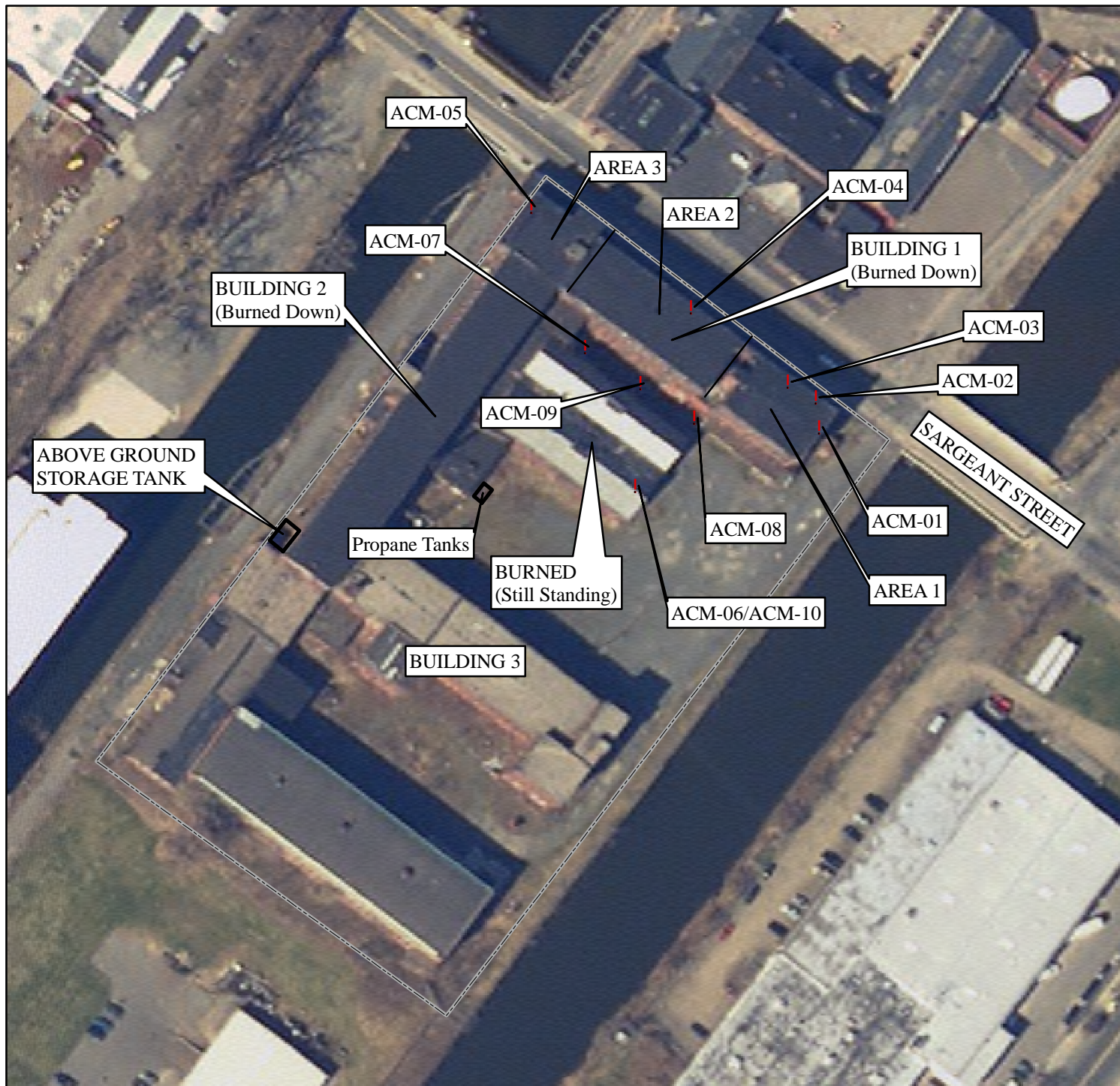


Figure 3

Sample Location Map

Parson's Paper Mill
84 Sargeant Street
Holyoke, Massachusetts

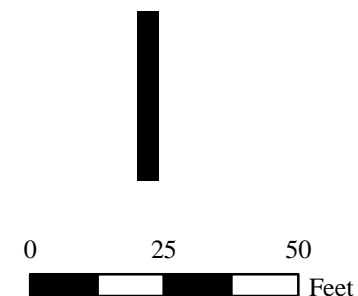
EPA Region I
Superfund Technical Assessment and
Response Team (START) III
Contract No. EP-W-05-042

TDD Number: 09-08-0005
Created by: Bonnie Mace
Created on: 9 October 2009
Modified by:
Modified on:

LEGEND

 Site Boundary
 ACM Samples

ACM = Asbestos-Containing Material



Data Sources:

Imagery: Massachusetts Geographic
Information System (MassGIS), Image No.
109882
Topos: MicroPath
All other data: START



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Attachment B

Tables

Table 1 - Sample Descriptions

Table 2 - Summary of Asbestos Results

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TABLE 1

SAMPLE DESCRIPTIONS
PARSON'S PAPER MILL
HOLYOKE, MASSACHUSETTS

Sample Location (Scribe No.)	Sample Date	Sample Time (hrs)	Sample Matrix	Sample Collection	Sample Depth (inches bgs)	Sample Source/ Description
ACM-01 (R01-090902TH-0001)	9/2/2009	1200	ACM	Grab	NA	Gray crushed concrete/mortar with brick collected from Area 1.
ACM-02 (R01-090902TH-0002)	9/2/2009	1210	ACM	Grab	NA	Gray crushed concrete/mortar with brick collected from Area 1.
ACM-03 (R01-090902TH-0003)	9/2/2009	1220	ACM	Grab	NA	Black tar sheeting used for roofing with metals collected from Area 1.
ACM-04 (R01-090902TH-0004)	9/2/2009	1230	ACM	Grab	NA	Black ash collected from Area 2 (Building 1).
ACM-05 (R01-090902TH-0005)	9/2/2009	1240	ACM	Grab	NA	Brown to gray soil, concrete debris collected from Area 3.
ACM-06 (R01-090902TH-0006)	9/2/2009	1250	ACM	Grab	NA	White fibrous pipe wrap.
ACM-07 (R01-090902TH-0007)	9/2/2009	1300	ACM	Grab	NA	Gray to black fiberboard collected between the buildings.
ACM-08 (R01-090902TH-0008)	9/2/2009	1310	ACM	Grab	NA	Black tar sheeting used for roofing.
ACM-09 (R01-090902TH-0009)	9/2/2009	1320	ACM	Grab	NA	Brown wallboard.
ACM-10 (R01-090902TH-0010)	9/30/2008	1330	ACM	Grab	NA	Field duplicate of ACM-06.

NA = Not Applicable

ACM = Asbestos-Containing Material

No. = Number

bgs = below ground surface

TABLE 2

**SUMMARY OF ASBESTOS RESULTS
PARSON'S PAPER MILL
HOLYOKE, MASSACHUSETTS**

SAMPLE LOCATION SAMPLE NUMBER SAMPLE DEPTH	ACM-06 R01-090902TH-0006 NA	ACM-07 R01-090902TH-0007 NA	ACM-10 R01-090902TH-0010 NA
PARAMETER			
Amosite	12	ND	5
Chrysotile	2	1	5

NOTES:

- 1) Asbestos samples analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) using EPA Region I SOP, EIASOP-IINGASBSD2, Polarized Light Microscope (PLM) with Dispersion Staining.
- 2) All results in percent (%).
- 3) ND = Not Detected.
- 4) NA = Not Applicable.

Attachment C

Photodocumentation Log

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PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the Former Parson's Paper buildings that were damaged in the June 2008 fire. Photograph taken facing north.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1138 hours

CAMERA: Nikon CoolPix 3100



SCENE: View of the Former Parson's Paper buildings that were damaged in the June 2008 fire. Photograph taken facing west.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1138 hours

CAMERA: Nikon CoolPix 3100

PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the Former Parson's Paper building that is still standing. Photograph taken facing south.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1138 hours

CAMERA: Nikon CoolPix 3100



SCENE: View of the burned building and the close proximity to the general public. Photograph taken facing southwest.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1141 hours

CAMERA: Nikon CoolPix 3100

PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the burned debris found in the southeastern section of Building 1. Photograph taken facing south.

DATE: 2 September 2009

TIME: 1152 hours

PHOTOGRAPHER: Noah Kutsch

CAMERA: Nikon CoolPix 3100



SCENE: View of the burned debris found in the southeastern section of Building 1. Photograph taken facing west.

DATE: 2 September 2009

TIME: 1152 hours

PHOTOGRAPHER: Noah Kutsch

CAMERA: Nikon CoolPix 3100

PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the burned debris found in the central section of Building 1. Photograph taken facing west.

DATE: 2 September 2009

TIME: 1154 hours

PHOTOGRAPHER: Noah Kutsch

CAMERA: Nikon CoolPix 3100



SCENE: View of the burned debris found in the northwestern section of Building 1. Photograph taken facing west.

DATE: 2 September 2009

TIME: 1155 hours

PHOTOGRAPHER: Noah Kutsch

CAMERA: Nikon CoolPix 3100

PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the burned debris found in the northwestern section of Building 1. Photograph taken facing south.

DATE: 2 September 2009

TIME: 1155 hours

PHOTOGRAPHER: Noah Kutsch

CAMERA: Nikon CoolPix 3100



SCENE: View of the lower levels than were not part of the reconnaissance due to the poor structural integrity of the building. Photograph taken facing south.

DATE: 2 September 2009

TIME: 1156 hours

PHOTOGRAPHER: Noah Kutsch

CAMERA: Nikon CoolPix 3100

PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the burned debris found in Building 2. Photograph taken facing south.

DATE: 2 September 2009

TIME: 1159 hours

PHOTOGRAPHER: Noah Kutsch

CAMERA: Nikon CoolPix 3100



SCENE: View of the burned debris found in Building 2. Photograph taken facing south.

DATE: 2 September 2009

TIME: 1200 hours

PHOTOGRAPHER: Noah Kutsch

CAMERA: Nikon CoolPix 3100

PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the aboveground storage tank with suspected asbestos-containing material (ACM) insulation. Photograph taken facing east.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1202 hours

CAMERA: Nikon CoolPix 3100



SCENE: View of the suspected ACM pipe wrap seen throughout the site. Photograph taken facing south.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1143 hours

CAMERA: Nikon CoolPix 3100

PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the suspected ACM pipe wrap seen throughout the site. Photograph taken facing northwest.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1221 hours

CAMERA: Nikon CoolPix 3100



SCENE: View of the suspected ACM pipe wrap seen throughout the site. Photograph taken facing west.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1221 hours

CAMERA: Nikon CoolPix 3100

PHOTOGRAPHY LOG SHEET
Parson's Paper Mill • Holyoke, Massachusetts



SCENE: View of the suspected ACM pipe wrap seen throughout the site. Photograph taken facing west.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1222 hours

CAMERA: Nikon CoolPix 3100



SCENE: View of the propane tanks staged outside the central building. Photograph taken facing west.

DATE: 2 September 2009

PHOTOGRAPHER: Noah Kutsch

TIME: 1222 hours


CAMERA: Nikon CoolPix 3100

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Attachment D

Chain-of-Custody Record

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(s): 

Site #: R01-090902TH *Former Parsons Paper Company*
Contact Name: Tom Hatzopoulos
Contact Phone: 617-918-1284

Lab Contact: Doris Guzman
Lab: OEME

Special Instructions:	SAMPLES TRANSFERRED FROM
	CHAIN OF CUSTODY #

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Attachment E

Analytical Data

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United States Environmental Protection Agency
Office of Environmental Measurement & Evaluation
11 Technology Drive
North Chelmsford, MA 01863-2431

Laboratory Report

September 11, 2009

Tom Hatzopoulos - HBR
US EPA New England R1
One Congress Street
Boston, MA 02114 - 2023

Project Number: 09090008

Project: Parsons Papermill - Holyoke, MA

Analysis: Bulk Asbestos Analysis by PLM

Analyst: Scott Clifford *OB for SC 9/11/09*

Analytical Procedure:

All samples were received and logged in by the laboratory according to the USEPA New England SOP for Sample Log-in.

Sample preparation and analysis was done following the EPA Region I SOP, EIASOP-INGASBSD2.

Sample preparation and analysis was done following the EPA Region 1 SOP, EIASOP-INGASBSD2.

Analytical Method: Polarized Light Microscope (PLM) with Dispersion Staining.

All quantities are estimated volume percent.

Date Samples Received by the Laboratory: 09/03/2009

Data were reviewed in accordance with the internal verification procedures described in the EPA New England OEME Chemistry QA Plan.

Results relate only to the items tested or to the samples as received by the Laboratory. This analytical report shall not be reproduced except in full, without written approval of the laboratory.

Report may contain multiple sections and each section will be numbered independently.

If you have any questions please call me at 617-918-8340

Sincerely,

Daniel N Boudreau 9/11/09
Daniel N Boudreau
Chemistry Team Leader

The asbestos content of floor tiles varies greatly. Studies of 200 tiles done by Hector S. MacDonald and John Bedore of the Brookfield Academy never found a tile with greater than 28% asbestos. Peter Cooke of the McCrone Research Institute states that the asbestos content of floor tiles was typically 12%. Components of the floor tiles make analysis by PLM with dispersion staining difficult. Plasma ashing and solvent extraction are techniques employed to remove this interference. I employed solvent extraction using THF and found only one tile containing a low level of chrysotile. Asbestos levels of ~1% are likely to be from mineral contamination. Using this method it is difficult to determine low levels of asbestos and negative results should be considered inconclusive.

US ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND LABORATORY

Parsons Papermill - Holyoke, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: R01-090902TH-0001
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97829
Matrix Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	ND	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	ND	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Reddish sand with rock, brick chunks and bits of burnt wood.
Traces of mineral wool.

Client Sample ID: R01-090902TH-0002
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97830
Matrix Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	ND	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	ND	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Reddish sand/brick material.

US ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND LABORATORY

Parsons Papermill - Holyoke, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: R01-090902TH-0003
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97831
Matrix: Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	ND	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	ND	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Chunks of brick material with long fibers visible. Sample is ~25% mineral wool.

Client Sample ID: R01-090902TH-0004
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97832
Matrix: Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	ND	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	ND	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Black, sandy material with debris and bits of burnt wood.

US ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND LABORATORY

Parsons Papermill - Holyoke, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: R01-090902TH-0005
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97833
Matrix Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	ND	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	ND	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Brown soil/sand.

Client Sample ID: R01-090902TH-0006
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97834
Matrix Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	12	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	2	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: White pipe insulation.

US ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND LABORATORY

Parsons Papermill - Holyoke, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: R01-090902TH-0007
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97835
Matrix Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	ND	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	1	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Flat black, hard tile like material.

Client Sample ID: R01-090902TH-0008
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97836
Matrix Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	ND	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	ND	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Flat, black root like material.

~10% cellulose.

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NEW ENGLAND LABORATORY

Parsons Papermill - Holyoke, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: R01-090902TH-0009
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97837
Matrix: Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	ND	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	ND	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Flat, cream colored hard material with straight fibers visible.

~80% mineral wool.

Client Sample ID: N/A
Date of Collection: N/A
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: N/A
Matrix: Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND		
	Amosite	ND		
	Anthophyllite	ND		
	Chrysotile	ND		
	Crocidolite	ND		
	Tremolite	ND		

Comments:

US ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND LABORATORY

Parsons Papermill - Holyoke, MA


Bulk Asbestos Analysis by PLM

Client Sample ID: R01-090902TH-0010
Date of Collection: 9/2/2009
Date of Extraction: 9/10/09
Date of Analysis: 9/11/09

Lab Sample ID: AA97838
Matrix: Solid

CAS Number	Compound	Concentration %	RL %	Qualifier
	Actinolite	ND	1.0	
	Amosite	5	1.0	
	Anthophyllite	ND	1.0	
	Chrysotile	5	1.0	
	Crocidolite	ND	1.0	
	Tremolite	ND	1.0	

Comments: Soft, white pipe insulation.

(s): 

Site #: R01-090902TH Former Parsons Paper Company

Contact Phone: 617-918-1284

Lab Contact: Doris Guzman

Lab: OEME

Special Instructions:	SAMPLES TRANSFERRED FROM
	CHAIN OF CUSTODY #

[illegible]